

April 18, 2023

Elizabeth Wohl  
Tel: (802) 451-2337  
ewohl@drm.com

**Via Email**

Ms. Donna Jerry  
Green Mountain Care Board  
State of Vermont  
144 State St.  
Montpelier, VT 05602  
donna.jerry@vermont.gov

Re: GMCB Docket 003-23con—REQUEST FOR EXPEDITED REVIEW

Dear Ms. Jerry:

By this letter, Grace Cottage Family Health & Hospital (“Grace Cottage”) submits an augmented request for expedited review of the above-captioned Application. On January 27, 2023, Grace Cottage Family Health & Hospital submitted a letter of intent to apply for a Certificate of Need to build a new medical office building for its Primary Care Practice and to demolish a portion of the existing building. On April 10, 2023, it submitted its application.

In support of this request, Grace Cottage submits the following information. As you know, a request for expedited review may be granted if the application (a) is likely to be uncontested and (b) does not substantially alter services. 18 V.S.A. § 9440(c)(5).

A project does not substantially alter services if:

1. The project raises no significant healthcare policy or planning concerns; and
2. the expenditures associated with the proposed project do not have a significant impact on the services provided, the cost of healthcare or the financial strength of the applicant.

*Green Mountain Care Board Rule 4.304.*

*4.304 Expedited Review*

**1. An applicant seeking expedited review of an application must show, and the Board must determine, that:**

**(a) the application is likely to be uncontested and the proposed project does not substantially alter services;**

This project does not substantially alter services. Grace Cottage seeks to provide the same primary care services that currently provides. It simply seeks to improve the space in which

those services are provided in order to increase the quality of care, the efficiency of the delivery of care, and the overall safety of the care and the experience.

Because the services are not going to be substantially altered, Grace Cottage does not anticipate that the application will be contested. Currently the two old buildings in which the Primary Care practice is housed have a springtime stream that runs through the basement, and have multiple entrances which decrease the safety of the building and confuse patients trying to access their providers. The Grace Cottage Board is strongly in support of this project, and is extremely grateful that a donor in the community has spurred the improvement of this facility. The need for additional primary care was amply demonstrated in Grace Cottage's most recent Community Health Needs Assessment, which is attached as an Appendix to the Application. In short, it is unlikely that the project will be opposed.

**2. A project does not “substantially alter services” if:**

**(a) the project raises no significant health care policy or planning concerns; an**

This project does not raise significant health care policy or planning concerns because it aims to provide the most efficient and effective level of care in a location that is otherwise significantly underserved. As the Application shows, Grace Cottage provides primary care (including integrated mental health and substance use treatment) to infants, children, adolescents, adults, and the elderly. These services when delivered in a timely and consistent manner, as Grace Cottage strives for, offset more expensive, higher intensity treatments. Therefore, the improvement of this physical facility aligns with the state's health care policy and planning goals.

**(b)(i) the expenditures associated with the proposed project or action do not have a significant impact on the services provided, the cost of health care, or the financial strength of the applicant; or**

As discussed in significant detail in the application, this project is an opportunity for Grace Cottage Family Health to improve the delivery of the same services it currently provides today without increased costs to the patients or the system. The expenditures associated with this project will improve the efficiency with which services can be provided and increase access to primary care, which has repeatedly been demonstrated to drive down the total costs of care in a health care system.

Currently, Grace Cottage delivers primary care in a facility comprised of two houses built in the 1800s. The buildings are drafty, inefficient from an energy and heating perspective, difficult to maintain, difficult to clean in accordance with modern infection prevent standard, and a frequent drain on the time and energy of the facilities staff, as they work to mitigate the ongoing deterioration of these buildings. In addition, as noted above, patient flow through these buildings is byzantine in its complexity. Patients are regularly routed through a maze of confusing, narrow corridors to complete even the simplest tasks.

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Improving patient flow and moving the practice into a more efficient facility is likely to have a positive impact on the services provided as well as the financial strength of Grace Cottage. These positive impacts will balance out the expenditures associated with the project over the life of the building. As demonstrated in detail in the financial tables, the applicant has the financial capacity to take on this project.

Thank you very much for your assistance thus far. We look forward to working with you to process this application as expeditiously as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Wohl", with a long horizontal flourish extending to the right.

Elizabeth Wohl

erw

cc: